

REMARKS

Claims 1, 3-6, 8-10, 13-19, and 22-26 are all the claims pending in the application.

Claims 1, 3-6, 8-10, 13-19 and 22-26 stand rejected on new prior art grounds.

I. Claim Rejections - 35 U.S.C. § 102

Claims 1, 5, 8, 9-10, 13-14, 18-19, and 22-23 stand rejected under 35 U.S.C. 102(b) as allegedly being anticipated by newly cited U.S. Patent No. 5,826,014 to Coley et al. (“Coley”).

Applicant respectfully traverses the rejection as follows.

A. Claims 1, 9, and 18

Independent claim 1 recites,

A network connection apparatus, comprising:

a computer-readable medium storing a computer program, which when executed by a computer processor, comprises a join module for connecting a second network, to which the join module belongs, with a first network in response to an inter-network connection request message transmitted from the first network, setting a security level of the first network to a set security level, and controlling network command messages in response to the set security level;

a connection module for receiving the inter-network connection request message transmitted from the first network and connecting the first network with the second network;

an authentication/security module for determining whether to allow a connection of the first network that has transmitted the inter-network connection request message to the connection module, and setting and checking the security level of the first network; and

a transmission module for transmitting a requested network command message requested by the first network when the connection is allowed by the authentication/security module;

wherein the security level is applied differently depending on the first network to be connected.

In rejecting claim 1, the Examiner cites col. 7, lines 54-56, and col. 8, lines 66-67 of Coley as allegedly teaching “setting a security level of the first network to a set security level.”

However, Coley is directed to providing a firewall for isolating network elements from a publicly accessible network to which the network elements are attached. *See Coley at Abstract.* To this end, Coley teaches that a firewall operating on a stand alone computer includes proxy agents that verify the authority of an incoming request to access a network element indicated in the request. *See Coley at Abstract; col. 7, lines 35-57.* More specifically, Coley teaches that the proxy agent makes an immediate verification check of an access request before initiating a port connection. If the access is deemed suspect, it is immediately discarded. *See Coley at col. 7, lines 54-57.* The reference further teaches that one type of verification involves a determination of whether a host source address of an incoming packet comports with a list of authorized or unauthorized addresses, or is within a designated range. *See Coley at col. 9, lines 36-39.*

That is, Coley merely teaches that a connection request is received and verified by a proxy agent in the firewall before the requesting network is connected to receiving network. However, Coley fails to teach or even suggest “setting a security level of the first network (*i.e.*, requesting network to a set security level.” Although the proxy agents may deem an incoming request “authorized” or “unauthorized,” the proxy agent does not set the security level of the requesting network.

Accordingly, Applicant submits that claim 1 is patentable over Coley because the reference fails to teach or suggest all of the features of claim 1. Since claims 9 and 18 recite features similar to those discussed above in conjunction with claim 1, Applicant submits that such claims are patentable at least for reasons similar to those set forth for claim 1.

With further regard to claim 9, the Examiner cites col. 10, lines 36-39 of Coley as allegedly teaching “transmitting the checked security level and the network command message to the second network.” However, the cited portion of the reference merely teaches that once the

proxy agent successfully completes its set of verification tests, the proxy agent initiates a connection request to the destination machine on behalf of the incoming access request. That is, Coley may teach facilitating a connection between the requesting network and the destination device, but the reference fails to teach or suggest that the proxy agent transmits the checked security level to the destination machine. In fact, as discussed above, Coley fails to teach setting the security level of the first network (*i.e.*, “the checked security level”), such that the proxy agents cannot transmit the checked security level.

Accordingly, Applicant submits that claim 9 is patentable over Coley for at least this additional reason. Since claim 18 recites features similar to claim 9, Applicant submits that claim 18 is patentable over Coley for at least similar reasons.

B. Claims 5, 8, 10, 13-14, 19, and 22-23

Since claims 5 and 8 are dependent upon claim 1, claims 10, 13, and 14 are dependent upon claim 9, and claims 19, 22, and 23 are dependent upon claim 18, Applicant submits that such claims are patentable at least by virtue of their respective dependencies.

II. Claim Rejections under 35 U.S.C. § 103(a) over Coley in view of U.S. Patent Appl. Publ. No. 2003/0051009 to Shah et al. (“Shah”)

Claims 3-4, 15-16, and 24-25 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Coley in view of Shah.

Since claims 3 and 4 are dependent upon claim 1, claims 15 and 16 are dependent upon claim 9, claims 24 and 25 are dependent upon claim 18, and Shah fails to cure the deficient teachings of Coley with respect to claims 1, 9, and 18, Applicant submits that such claims are patentable at least by virtue of their respective dependencies.

With further regard to claim 3, the Examiner cites paragraph [0031] of Shah as allegedly teaching “a component module for generating a component representing services of the devices present in the second network on a basis of the information about the devices collected by the management module.” However, the cited portion of Shah merely teaches maintaining a view of each device and its current state, as well as a dynamic view of all the devices that are currently available. See Shah at paragraph [0031]. That is, Shah fails to teach or suggest maintaining a view of the services of the devices that are currently available. Therefore, Applicant submits that Coley and Shah, taken alone or in combination, fail to teach or suggest “generating a component representing services of the devices present in the second network.”

Accordingly, Applicant submits that claim 3 is patentable over Coley and Shah for at least this additional reason.

III. Claim Rejection under 35 U.S.C. § 103(a) over Coley in view of U.S. Patent No. 6,725,281 to Zintel et al. (“Zintel”)

Claims 6, 17, and 26 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Coley in view of Zintel.

Since claim 6 is dependent upon claim 1, claim 17 is dependent upon claim 9, claim 26 is dependent upon claim 18, and Zintel fails to cure the deficient teachings of Coley with respect to claims 1, 9, and 18, Applicant submits that such claims are patentable at least by virtue of their respective dependencies.

IV. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

/Ryan M. Corbett/

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

Ryan M. Corbett
Registration No. 63,724

WASHINGTON OFFICE
23373
CUSTOMER NUMBER

Date: April 22, 2009